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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAMON MURIC-DORADO,
Plaintiff

VS

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.

Defendants.

CASE NO.: 2:18-cv-01184-JCM-EJY

**DEFENDANT RAYMOND BUNCH'S
MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND
PLAINTIFF'S COMPLAINT**

(1st Request)

Defendant Raymond Bunch (“Bunch”), by and through his counsel, Kaempfer Crowell, hereby moves to extend time to answer or otherwise respond to Plaintiff’s complaint (First Request). This Motion is based on the pleadings and papers on file herein, LR 6-1 and LR 7-5, the following Memorandum of Points and Authorities, and the argument of counsel as made be-

111

1 heard by this Court.

2 DATED February 7, 2020.

3 KAEMPFER CROWELL

4 */s/ Lyssa S. Anderson*

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11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **I. INTRODUCTION**

13 The Court issued Summons for various Defendants in this Case on October 1, 2019.
14 (ECF No. 23.) The Court issued summons for Bunch some time later (ECF No. 32.) Shortly
15 thereafter, Plaintiff served Richard Newman, Angela Patton, James Portello, Cesar Esparza,
16 Kenneth Kelsey, Rogelio Mariscal, and Tutulupeatau Mataele and then these Defendants
17 answered the complaint on November 18, 2019. (ECF No. 34.)

18 Plaintiff served Bunch much later—on January 15, 2020. Due to a calendaring error,
19 Bunch has not yet filed an answer. Bunch therefore respectfully moves this Court to extend the
20 time to answer Plaintiff's complaint till February 7, 2020—the same day he moves this Court for
21 an extension.

22 **II. ARGUMENT**

23 According to LR 26-4, “applications to extend any date set by the discovery plan,
24 schedule or other order must, in addition to satisfying the requirements of LR 6-1, be supported

1 by a showing of good cause for the extension.” It is stated herein that this Motion conforms with
2 the requirements of LR 6-1 as it is clear from the caption and opening paragraphs that this is
3 LVMPD’s first request for seeking an extension of time to respond to the Plaintiff’s Complaint.

4 This brief extension is meant only to permit Bunch to answer as soon as practicable.
5 Bunch's counsel only realized the calendaring error on February 7, 2020 and worked to prepare
6 an answer this same day. Indeed, the response was due February 5, 2020 and Bunch is filing his
7 Answer February 7, 2020. This is merely a two (2) day extension. The extension of time should
8 not result in prejudice to anyone as Bunch's counsel represents the other Defendants and the case
9 can proceed on its normal course. Neither the Plaintiff nor the Court will suffer any prejudice.
10 Most importantly, allowing this brief extension will ensure that the case is litigated on its merits
11 with Bunch having an opportunity to assert his defenses.

12 | III. CONCLUSION

Based upon the foregoing, Bunch requests that the deadline for him to plead or otherwise respond to Plaintiff's Complaint be extended till February 7, 2020.

15 DATED February 7, 2020.

KAEMPFER CROWELL

By: /s/ Lyssa S. Anderson

LYSSA S. ANDERSON (Nevada Bar No. 5781)
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ORDER

IT IS SO ORDERED.

Eugene F. Zouchal
U.S. MAGISTRATE JUDGE

Dated: February 10, 2020

*Attorneys for Defendants
Richard Newman, Angela Patton,
James Portello, Cesar Esparza,
Kenneth Kelsey, Rogelio Mariscal,
Tutulupeatau Mataele, and Raymond Bunch*